

AGENDA ITEM 4b
FINANCIAL STATEMENT AUDIT MANAGEMENT LETTER COMMENTS
CURRENT YEAR REPORT
AS OF DECEMBER 31, 2010

Audit (Report Issue Date): Report to Management for the Year Ended 06/30/10 (11/17/10)

Observation 1: Recognition of Multi-year Contract Expenses

Division responsible: Fiscal Services Division

Observation:

During the fiscal year 2009/2010, CalPERS recorded certain expenses in the general ledger based on the encumbrance of multi-year contract amounts, which resulted in the recognition of expenses that had not yet been incurred. Expenses should be recorded in the fiscal year in which the related goods are received or services are rendered, regardless of the timing of contract authorization, in accordance with generally accepted accounting principles (GAAP). As of June 30, 2010, CalPERS' personnel analyzed expenses greater than \$100,000, by budget line item; expenses that had not yet been incurred were manually reversed out of the general ledger. While the current methodology assures that the financial statements fairly present, in all material respects, multi-year contract expenses, the process results in the following deficiencies:

- a. There is a risk that expenses less than \$100,000, by budget line item, are not recorded in the proper fiscal year in accordance with GAAP.
- b. The process is inefficient as personnel were required to investigate the recorded multi-year contract expense amounts and manually correct certain amounts that were improperly recognized during the fiscal year.
- c. Expenses reported in the Statement of Changes in Fiduciary Net Assets and supplemental Administrative Expenses Schedule had to be corrected for financial reporting purposes.

CalPERS should implement a process to ensure that multi-year contract expenses are reported in the proper period. Multi-year contract expenses should be recorded in the general ledger as the related goods are received or services are rendered.

Management's Response:

CONCUR. Fiscal Services concurs with the recommendations. Although we currently have a process to address multi-year contract expenses to ensure that CalPERS' financial statements are fairly presented, we will explore alternative processes which meet CalPERS' GAAP and budget-based reporting requirements. In addition, Fiscal Services will modify and refine the current procedure to address the deficiencies noted above and ensure that accruals and expenses for multi-year contracts are properly recorded. Fiscal Services expects to complete this by September 30, 2011.

AGENDA ITEM 4b
FINANCIAL STATEMENT AUDIT MANAGEMENT LETTER COMMENTS
CURRENT YEAR REPORT
AS OF DECEMBER 31, 2010

Observation 2:	Executive Review of Draft Financial Statements
Division responsible:	Fiscal Services Division

Observation:

There is currently no process in place to ensure that all CalPERS executives have an opportunity to review the draft financial statements prior to the Finance Committee's approval of the financial statements. Representatives from each of CalPERS' divisions and offices should have an opportunity to review the draft financial statements to ensure proper reporting and disclosure of CalPERS' unique activities and services.

We strongly encourage the Fiscal Services Division to distribute the draft financial statements to the appropriate executive personnel for review prior the Finance Committee's approval of the financial statements. We further recommend that Fiscal Services develop a process to review and respond to the comments and suggestions made by executive personnel to ensure that CalPERS' financial statements offer readers the most thorough and transparent view of CalPERS' financial activities and transactions.

Management's Response:

CONCUR. Fiscal Services concurs with the recommendations. In the past, the draft basic financial statements have been reviewed by a limited number of management. Going forward, Fiscal Services will ensure that the draft basic financial statements will be circulated among key executives and appropriate personnel for review and comment at an earlier date during our normal review process. In doing so, any concerns or comments from executives and appropriate personnel can be addressed prior to the presentation of the draft basic financial statements to the Finance Committee. Fiscal Services expects to complete this by September 30, 2011.